The Honorable Marc L. Barreca Chapter 7

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

No. 10-19817-MLB

ADAM R. GROSSMAN,

Debtor.

JILL BORODIN'S OBJECTION TO TRUSTEE'S EX PARTE MOTION FOR AMENDED ORDER AUTHORIZING EMPLOYMENT OF ROB MIDDLETON AND THE HOUSE OF REALTY, INC. AS REAL ESTATE AGENTS FOR THE TRUSTEE

Jill Borodin, creditor herein, by and through her counsel, Steven J. Reilly of Crocker Law Group PLLC, hereby objects to the Trustee's Ex Parte Motion for Amended Order Authorizing Employment of Rob Middleton and The House of Realty, Inc. as Real Estate Agents for the Trustee.

It is disputed whether the property located at 868 Montcrest Drive, Redding, CA 96003(the "Montcrest Property") is property of the bankruptcy estate. On or about February 14, 2012, Ms. Borodin timely filed a proof of claim asserting ownership of the Montcrest Property, *Claim No. 17-1*. The Trustee has not objected to Ms. Borodin's proof of claim.

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720 Olive Way, Suite 1000, Seattle, WA 98101 P) 206-624-9894 F) 206-624-8598

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Furthermore, Mr. Borodin and the Trustee's former counsel, Denice Moewes, and the Trustee's present counsel, Bruce Kriegman, have been, and continue to be, engaged in settlement discussions relating to the Montcrest Property. Thus, any application to employ a realtor to market and sell the Montcrest Property is premature at best.

DATED this 16<sup>th</sup> day of May, 2013.

CROCKER LAW GROUP PLLC

By /s/ Steven J. A Reilly
Steven J. Reilly, WSBA #44306
Attorneys for Jill Borodin

JILL BORODIN'S OBJECTION TO TRUSTEE'S EX PARTE MOTION FOR AMENDED ORDER AUTHORIZING EMPLOYMENT OF ROB MIDDLETON AND THE HOUSE OF REALTY, INC. AS REAL ESTATE AGENTS FOR THE TRUSTEE - 2

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